

EXHIBIT “A”

FILED: QUEENS COUNTY CLERK 02/10/2020 12:56 PM

INDEX NO. 702302/2020

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 02/10/2020

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:

Date Purchased:

-----X
CARLA EDWARDS,

SUMMONS

Plaintiff,

Plaintiff designates
Queens County as the
place of trial.

-against-

TARGET CORPORATION,

The basis of venue is
Plaintiff's Residence
108-36 160th Street,
Jamaica, NY 11433

Defendant.
-----X

County of Queens

To the above named Defendant:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: West Hempstead, New York
February 10, 2020

Yours, etc.

LEVINE AND WISS, PLLC

By: *Sasha Shafeek*
SASHA SHAFEEK, ESQ.

Attorneys for Plaintiff

CARLA EDWARDS

510 Hempstead Turnpike, Suite 206

West Hempstead, New York 11552

(516) 747-3222

File #:LAW 3698/SS.uc

LEVINE AND WISS, PLLC
Attorneys at Law
510 Hempstead Tpke
W Hempstead, NY 11552
(516) 747-3222

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DEFENDANT'S ADDRESS:

TARGET CORPORATION
1000 Nicollet Mall
Minneapolis, Minnesota 55403
Via Secretary of State

LEVINE AND WISS, PLLC
Attorneys at Law
510 Hempstead Tpke
W. Hempstead, NY 11552
(516) 747-3222

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----X
CARLA EDWARDS,

Index No.:

Plaintiff,

-against-

COMPLAINT

TARGET CORPORATION,

Defendant.
-----X

Plaintiff, CARLA EDWARDS, by her attorneys, LEVINE AND WISS, PLLC,
complaining of the defendant, respectfully allege, upon information and belief:

1. That at the time of the commencement of this action, plaintiff was and still is a resident of the County of Queens, City and State of New York.
2. That the cause of action alleged herein arose in the County of Nassau, State of New York.
3. That this action falls within one or more of the exceptions set forth in CPLR §1602.
4. That at all times hereinafter mentioned, defendant TARGET CORPORATION was and still is a domestic business corporation duly organized and existing under and by virtue of the laws of the State of New York.

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5. That at all times hereinafter mentioned, defendant TARGET CORPORATION was and still is a foreign business corporation duly organized and existing under and by virtue of the laws of the State of New York.

6. That at all times hereinafter mentioned, defendant TARGET CORPORATION maintained a principal place of business in the County, City and State of New York.

7. That at all times hereinafter mentioned, defendant TARGET CORPORATION does business in the State of New York.

8. That at all times hereinafter mentioned, defendant TARGET CORPORATION derived substantial revenue from goods used or consumed or services rendered in the State of New York.

9. That at all times hereinafter mentioned, defendant TARGET CORPORATION expected or should reasonably have expected its acts to have consequences in the State of New York.

10. That at all times hereinafter mentioned, defendant TARGET CORPORATION derived substantial revenue from interstate or international commerce.

11. That at all times hereinafter mentioned, defendant TARGET CORPORATION owned the premises located at 2003 Broadway Mall, Hicksville, NY 11801.

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12. That at all times hereinafter mentioned, on or about January 1, 2017, defendant TARGET CORPORATION was the owner of the property located at 2003 Broadway Mall, Hicksville, NY 11801.

13. That at all times hereinafter mentioned, defendant TARGET CORPORATION leased the property located at 2003 Broadway Mall, Hicksville, NY 11801.

14. That at all times hereinafter mentioned, defendant TARGET CORPORATION rented the property located at 124 East Jericho Turnpike, Huntington Station, County of Suffolk, State of New York.

15. That at all times hereinafter mentioned, defendant TARGET CORPORATION operated a store at the aforesaid premises.

16. That at all times hereinafter mentioned, defendant TARGET CORPORATION was responsible for the maintenance of the aforesaid premises.

17. That at all times hereinafter mentioned, defendant TARGET CORPORATION controlled the aforesaid premises.

18. That at all times hereinafter mentioned, defendant TARGET CORPORATION managed the aforesaid premises.

19. That at all times hereinafter mentioned, defendant TARGET CORPORATION inspected the aforesaid premises.

20. That at all times hereinafter mentioned, defendant TARGET CORPORATION was responsible for the repairs of the aforesaid premises.

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21. That at all times hereinafter mentioned, defendant TARGET CORPORATION cleaned the aforesaid premises.

22. That at all times hereinafter mentioned, defendant TARGET CORPORATION was responsible for keeping the aforesaid premises clean and in a safe condition.

23. That at all times hereinafter mentioned, defendant TARGET CORPORATION extended a general invitation to the public to enter and patronize its store.

24. That on September 2, 2018, plaintiff CARLA EDWARDS was lawfully at the aforesaid premises.

25. That on September 2, 2018, while plaintiff CARLA EDWARDS was lawfully at the aforesaid location, she was caused to fall at the aforementioned premises and sustain severe and permanent injuries.

26. That the defendant TARGET CORPORATION created the dangerous condition thereat.

27. That the defendant, their agents, servants and/or employees were negligent, reckless and careless in the possession, control, supervision, direction, construction, repair, maintenance and management of the aforesaid premises.

28. That on September 2, 2018, while plaintiff, CARLA EDWARDS, was lawfully at the aforesaid premises, she was caused to sustain severe and permanent injuries when she was struck by a pallet or other materials by the defendants, their

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servants, agents, employees at the aforesaid premises.

29. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of defendant, without any fault or negligence on the part of the plaintiff CARLA EDWARDS contributing thereto.

30. The above-mentioned occurrence, and the results thereof, were caused by the negligence of the defendant and/or said defendant's agents, servants, employees, contractors and/or licensees in the ownership, operation, management, maintenance and control of the aforesaid premises.

31. That by reason of the aforesaid occurrence plaintiff CARLA EDWARDS sustained serious, severe and permanent personal injuries, still suffers and will continue to suffer, great physical and mental pain and serious bodily injury, became, sick, sore, lame and disabled and so remained for a considerable length of time; and plaintiff CARLA EDWARDS was otherwise damaged.

32. That by reason of the foregoing, plaintiff CARLA EDWARDS has been damaged in an amount which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action.

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WHEREFORE, plaintiff demands judgment against the defendant in an amount which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action; together with the interest, costs and disbursements.

Dated: West Hempstead, New York
February 10, 2020

Yours, etc.

LEVINE AND WISS, PLLC

By: 
SASHA SHAFEEK, ESQ.

Attorneys for Plaintiff

CARLA EDWARDS

510 Hempstead Turnpike, Suite 206

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

CARLA EDWARDS,

Plaintiff,

-against-

TARGET CORPORATION,

SUMMONS AND COMPLAINT

LEVINE AND WISS, PLLC

Attorneys for Plaintiff

Office and Post Office Address, Telephone

510 HEMPSTEAD TURNPIKE, SUITE 206

WEST HEMPSTEAD, NEW YORK 11552

(516) 747-3222

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the Courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained on the annexed document are not frivolous and that we are in compliance with the remaining sections thereof and with Section 22 NYCRR 1200.41-a.

Dated: February 10, 2020

Signature



Print Signer's Name Sasha Shafieek Esq.

Service of a copy of the within

is hereby admitted

Dated

Attorneys for

S I R - PLEASE TAKE NOTICE



that the within is a (certified) true copy of a
duly entered in the office of the clerk of the within named court on

NOTICE OF
ENTRY

that an Order of which the within is a true copy will be presented for settlement to the
Hon. _____ one of the judges of the within named court, at

NOTICE OF

SETTLEMENT on

at

AM.

Dated:

Yours, etc.,

LEVINE AND WISS, PLLC

Attorneys for Plaintiff

Office and Post Office Address, Telephone

510 HEMPSTEAD TURNPIKE, SUITE 206

WEST HEMPSTEAD, NEW YORK 11552

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